

UNITED STATES DISTRICT COURT

for the

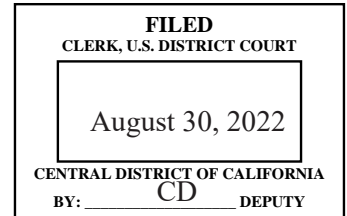
Central District of California



United States of America
v.
EDUARD GASPARYAN,
aka "Rudy Pineda",
aka "Papin Galstyan",

Defendant(s)

Case No. 2:22-mj-03431-DUTY



**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

As described in the accompanying attachment, defendant violated the following statutes:

Code Section

18 U.S.C. §§ 1344, 1349, 1028A

*Offense Description*Conspiracy to Commit Bank Fraud,
Aggravated Identity Theft

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

/s/ *Marcus Johnson*

Complainant's signature

Marcus Johnson, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: August 30, 2022City and state: Los Angeles, California

Judge's signature

Hon. Alka Sagar, U.S. Magistrate Judge

Printed name and title

Complaint Attachment

Count One, 18 U.S.C. § 1349

Beginning in or before 2019, and continuing through at least August 30, 2022, in Los Angeles County, within the Central District of California, and elsewhere, defendant EDUARD GASPARYAN, aka “Rudy Pineda,” aka “Papin Galstyan” (“Defendant”), and others, conspired to commit bank fraud, in violation of Title 18, United States Code, Section 1344. The object of the conspiracy was carried out, and to be carried out, in substance, as follows: Defendant and his co-conspirators would steal the identities of victims. Defendant would impersonate those victims and apply for unemployment benefits in their names, as well as in multiple variations of his own name, in order to obtain California EDD debit cards. Defendant would use the EDD debit cards, which were issued by Bank of America, a federally-insured financial institution, to withdraw cash from ATMs, resulting in actual losses well in excess of \$800,000.

Count Two, 18 U.S.C. § 1028A

Beginning in or before 2019, and continuing through at least August 30, 2022, in Los Angeles County, within the Central District of California, and elsewhere, defendant EDUARD GASPARYAN, aka “Rudy Pineda,” aka “Papin Galstyan,” knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person during and in relation to a felony violation of Title 18, United States Code, Section 1349, Conspiracy to Commit Bank Fraud, as charged in Count One, knowing that the means of identification belonged to another actual person.

AFFIDAVIT

I, Marcus Johnson being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent ("SA") with the United States Department of Labor - Office of Inspector General ("DOL-OIG"), and have been so employed since January 2022. My responsibilities as a DOL-OIG SA include investigating Unemployment Insurance ("UI") fraud, bank fraud, mail fraud, identity theft, employee misconduct, and other related crimes. Prior to my employment with DOL-OIG, I was a SA with the United States Railroad Retirement Board - Office of Inspector General ("RRB-OIG") where I investigated allegations of UI fraud and disability program fraud.

2. I am a graduate of the Federal Law Enforcement Training Centers ("FLETC") in Glynco, Georgia. As part of the training provided at FLETC, I successfully completed the Basic Training course, which included, but was not limited to, courses in criminal and constitutional law. I have a Bachelor's degree in Political Science, a Bachelor's degree in Criminal Justice, and a Master's degree in Emergency Management and Homeland Security. I have experience in conducting surveillances, interviews of subjects and witnesses, financial analysis of individuals, executing warrants in connection with fraud investigations, and collaborating with other law enforcement agencies.

II. SEEKING COMPLAINT AND ARREST WARRANT

3. This affidavit is made in support of a complaint against EDUARD GASPARYAN ("GASPARYAN") for conspiracy to commit bank fraud and aggravated identity theft, in violation of Title 18, United States Code, Sections 1028A, 1344, and 1349.

4. The information set forth in this affidavit is based upon my participation in the investigation, encompassing my personal knowledge, observations and experience, as well as information obtained through my review of evidence, investigative reports, and information provided by others, including other law enforcement partners. As this affidavit is being submitted for the limited purpose of securing the requested warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for the requested warrants.

III. STATEMENT OF PROBABLE CAUSE

A. GASPARYAN's Fraud Scheme

5. EDUARD GASPARYAN (GASPARYAN) is suspected of operating an unemployment insurance ("UI") fraud and identity theft scheme. As described below, the scheme involves using other individuals' identities to apply for EDD UI benefits. As described below, GASPARYAN uses other individuals' identities to apply for EDD UI benefits. From there, he uses a few addresses to receive dozens of EDD cards in his own name or variations thereof, and in the names of others, who may be the victims of

identity theft, or may be complicit. Often times he slightly alters the address he lists on the unemployment insurance application, which might reflect "Apt. 3," or "Apt. 03," or "Unit 3," for example.

6. In my training and experience, many fraudsters know that EDD tries to detect when an unusual number of debit cards are being sent to a single address, and so they alter the addresses they use in ways that will not prevent mail deliver, but that they hope would prevent a computer from finding an exact match. Additionally, fraudsters will attempt to avoid EDD detection by altering the SSN on the claim they submit, or by altering the claimants' name somewhat. As described below, GASPARYAN has sometimes reversed the order of his name, or tweaked his SSN, in an apparent effort to prevent his different claims from matching each other.

B. Over \$500,000 in Benefits Were Mailed to GASPARYAN's Sherman Way Address in the Form of Bank of America Debit Cards

7. According to California EDD records, from February 2020 to the present, EDD has paid out approximately \$544,089 on UI benefits under the PUA program on at least 32 claims using 13823 Sherman Way Apt 3, Van Nuys, CA, 91405, or variations thereof¹, as the named claimant's mailing address.

¹ At least 32 claims submitted to EDD list "13823 Sherman Way Apt 3", or variations of "Apt 3" as the claimant mailing address. These variations include "Apt 03, Apt 003, Apt 103, Apt 0103, Unit 3, Unit 003, Unit 0103, #3". Applying for numerous claims under slight variations of the same address is a common tactic seen in UI fraud submissions as a method of attempting to avoid detection.

8. According to California Department of Motor Vehicles, GASPARYAN provided that address (13823 Sherman Way Apt 3, Van Nuys, CA 91405) as his mailing address. Law enforcement databases also confirm the same address as belonging to GASPARYAN.

9. On or about February 10, 2021, a California EDD UI claim was submitted under GASPARYAN's name, with 13823 Sherman Way Apt 03, Van Nuys, CA 91405 as the mailing address, however the SSN on this claim was slightly altered from GASPARYAN's true SSN. This claim was subsequently paid out by EDD.

10. On or about April 24, 2021, a California EDD UI claim was submitted under the name "Papin Galstyan", with 13823 Sherman Way, Apt 3, Van Nuys, CA 91405, as the mailing address. As described later in this affidavit, "Papin Galstyan" is one of the identities GASPARYAN uses in his fraud.

C. Over \$300,000 in Benefits Were Mailed to an Encino Ave Address Used by GASPARYAN in the form of Bank of America Debit Cards

11. According to California EDD records, from February 2020 to the present, EDD has paid out approximately \$307,012 in UI benefits under the PUA program on at least 16 claims using 10832 Encino Ave, or variations thereof, as the named claimant's mailing address. EDD records further show:

a. On or about July 16, 2021, a California EDD UI claim was submitted under the name "Gasparyan Eduard," that is reversing the order of GASPARYAN's true name, with 10832 Encino Ave house 1, San Fernando CA 91344, as the mailing address.

GASPARYAN's true date of birth was listed on the application, however, the SSN on the application is an altered variation of his own. (In several other claims, GASPARYAN's name also appears reversed).

b. On or about August 26, 2021, a California EDD UI claim was submitted under the name "Eduard Gasparyan", with 10832 Encino Ave, Granada Hills CA 91344, as the mailing address. GASPARYAN's true date of birth was listed on the application, however, the SSN on the application was not his.

c. On or about August 29, 2021, a California EDD UI claim was submitted under the name "Gasparyan Eduard", with 10832 Encino Ave, Granada Hills, CA 91344, as the mailing address. GASPARYAN's true date of birth was listed on the application, however, the SSN on the application is an altered variation of his own.

D. Bank of America ATM Surveillance Photos Show GASPARYAN and Angela Karchyan Making Over 200 Withdrawals Using Debit Cards in Other Persons' Names

12. Based on records provided by Bank of America, GASPARYAN was captured via Automated Teller Machine ("ATM") surveillance footage making numerous cash withdrawals from debit cards in other persons' names. I recognize these images to be GASPARYAN based on a comparison with his California DMV photo. In many of the photos, GASPARYAN also wears the same pairs of sunglasses, a silver watch, and other consistent accessories. These videos and bank records show:

a. On or about March 9, 2021, GASPARYAN was captured via surveillance camera located within a Bank of America ATM unit making numerous cash withdrawals from debit cards. Specifically, within a time span of approximately five minutes, \$2,860 is withdrawn from six debit cards. None of the cards were issued in GASPARYAN's name.



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b. On or about July 5, 2021, GASPARYAN was captured via surveillance camera located within a Bank of America ATM unit making numerous cash withdrawals from debit cards. Specifically, within a time span of approximately two minutes, \$3,000 is withdrawn from three debit cards. None of the cards were issued in GASPARYAN's name.



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c. On or about August 9, 2021, GASPARYAN was captured via surveillance camera located within a Bank of America ATM unit making numerous cash withdrawals from debit cards. Specifically, within a time span of approximately six minutes, \$10,000 was withdrawn from ten debit cards. Three of the debit cards were issued in GASPARYAN's name, and seven of the debit cards are in the names of other individuals.



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d. On or about August 23, 2021, GASPARYAN was captured via surveillance camera located within a Bank of America ATM unit making numerous cash withdrawals from debit cards. Specifically, within a time span of approximately seven minutes, \$4,500 was withdrawn from nine debit cards. Three of the debit cards were issued in GASPARYAN's name, and six of the debit cards are in the names of other individuals. The UI applications linked to the three debit cards issued to GASPARYAN were each submitted using a different SSN, causing the applications to bypass EDD detection.



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e. There were similar images taken from transactions on at least 50 dates involving over 200 withdrawals through December of 2021. Most of these showed GASPARYAN doing the withdrawals, but many showed Angela Karchyan doing them as well. There is a lag between requesting images and receiving them, and my last request was in January 2022, but Bank of America has not yet fulfilled that entire request.

E. GASPARYAN Uses the ID.me Verification System to Submit Fraudulent EDD UI Claims

13. I reviewed records from ID.me identity verification systems, which shows that GASPARYAN uses their platform to submit supporting documentation for EDD UI claims. ID.me is a website that attempts to verify the identities of persons using it by asking them for biographical information, photographs, identification cards, proof of address, and similar information. Many government agencies contract out identity verification to ID.me, as does EDD. As a result of these fraudulently submitted identity verification documents, the claims were approved and UI benefits were subsequently issued. ID.me provided approximately 1,700 images associated with UI claim records requested in this investigation. The images include close-up headshot pictures of the user submitting the claims, driver's licenses, utility statements, IRS Form W-2s, U.S. Employment Authorization cards, Social Security cards, U.S. Passports, and other identity documents, many of which were apparently altered. From my review of ID.me records, I learned the following:

a. In over 200 images, GASPARYAN's close-up headshot picture is submitted. I recognize this to be GASPARYAN based on a comparison with his California DMV photo, and other identification documents reviewed in this investigation. Because of variations in GASPARYAN's clothing, the background of the images, and changes in hair and facial hair, these images appear to be taken at different points in time.

b. In over 200 images, GASPARYAN's California DMV photo, or other headshot picture, appear on various identification documents not in his name, including the following:

i. In at least one image, GASPARYAN's picture is seen on California Driver's License under the name "Ming X Jan Han", used in a UI claim submission.

ii. In at least one image, GASPARYAN's picture is seen on a California Driver's License under the name "Yuchen Chan Yang", used in a UI claim submission.

iii. In at least one image, GASPARYAN's picture is seen on a California Driver's License under the name "Yanru Zhou", used in a UI claim submission.

iv. In at least one image, GASPARYAN's picture is seen on a California Driver's License under the name "Christen Gadrielian", used in a UI claim submission.

F. The First Search of GASPARYAN's Residence Reveals Identity Theft Evidence, Firearms, and Suspected Narcotics

14. On July 12, 2022, California Highway Patrol (CHP) executed several search warrants at addresses believed to be controlled by GASPARYAN. DOL-OIG assisted with the search of what was believed to be GASPARYAN's primary residence, located at 17843 Rinaldi St., Granada Hills, CA. During the search of GASPARYAN's residence, officers and agents discovered the following, in part:

a. Bulk amounts of personal identifying information - including Social Security cards, Driver's Licenses, Department of Homeland Security Employment Authorization Cards, and other identity documents not in GASPARYAN's or KARCHYAN's name;

b. Bulk amounts of mail in other individuals' names - including mail from Bank of America, California EDD, and the Internal Revenue Service;

c. Bulk bank documents - including bank cards, monetary instruments, and personal checks addressed to individuals other than GASPARYAN and KARCHYAN, drawn from accounts under the names of various individuals;

d. Indicia of occupancy, including pictures in the living room of GASPARYAN and what appears to be his family;

e. Two handguns, at least one of which was a "ghost gun", which is a firearm manufactured without traceable serial numbers;

- f. One "ghost" AR-15 style rifle;
- g. One high capacity 33-round pistol magazine, and two 10-round rifle magazines;
- h. Several bags, containers, magazines, and/or boxes of firearm ammunition;
- i. Approximately 109 grams of suspected methamphetamine (net weight with packaging);
- j. Approximately 61.9 grams of suspected heroin (net weight with packaging).

G. GASPARYAN lives at 17823 Rinaldi St. Granada Hills, CA.

15. During the July 12, 2022 search of the Rinaldi St. residence, an individual ("O.A.") arrived and identified themselves as the landlord of the residence. DOL-OIG agents interviewed O.A., and O.A. identified GASPARYAN and ANGELA KARCHYAN (KARCHYAN) via photograph as living at SUBJECT PREMISES. O.A. stated GASPARYAN and KARCHYAN are their tenants, and GASPARYAN and KARCHYAN have lived there since October 2021. O.A. also knows GASPARYAN and KARCHYAN to be married.

16. O.A. verbally stated GASPARYAN used the identity "Rudy Pinedd" when renting SUBJECT PREMISES. Investigator Dasilva stated O.A. identified GASPARYAN as "Rudy Pineda".

H. GASPARYAN Uses the Identity "Rudy Pineda" in this Fraud Scheme

17. Rudy Pineda (Pineda) is a suspected identity theft victim that DOL-OIG agents have interviewed previously in this

investigation. During the interview, Pineda stated he does not know who GASPARYAN is, and did not give him permission to use his identification to file for unemployment benefits.

18. During GASPARYAN's arrest in April 2022 in Las Vegas, Nevada, officers recovered a Chase Bank Debit Card embossed with the name "Rudy Pineda", according to police reports.

19. I reviewed a UI claim submitted under the name "Yun Chin Tung" using ID.me verification software, and discovered the following associated with this claim submission:

a. GASPARYAN submitted an apparently altered California Driver's License with his image, bearing the name "Isaac Rudy Pineda," a variation of his "Rudy Pineda" identity. (GASPARYAN also submitted another apparently altered California Driver's License with his image, bearing the name "Yun Chin Tung," so it appears that he mistakenly used the wrong counterfeit license with this fraudulent application before correcting his error);

b. GASPARYAN submitted a Social Security card bearing the name "Yun Chin Tung", and a social security number that is not his;

c. GASPARYAN submitted a "selfie" with a clear, unobstructed image of his face;

d. GASPARYAN submitted an apparently altered U.S. Department of Homeland Security Employment Authorization Card with his image, bearing the name "Yun Chin Tung" in this claim submission.

I. GASPARYAN Uses the Identity "Papin Galstyan" in this Fraud Scheme

20. Papin Galstyan is the true identity of an individual who, according to U.S. Department of Homeland Security records, has not entered the U.S. since October 12, 2020.

21. I reviewed a UI claim submitted under the name "Papin D Galstyan" using ID.me verification software, and discovered the following associated with this claim submission:

a. GASPARYAN submitted a California Driver's License with an image that is not of him, bearing the name "Papin Daviti Galstyan";

b. GASPARYAN submitted an Internal Revenue Service form W-2, containing the name "Papin D Galstyan", but with the address listed of "13823 Sherman Way, Apt 3, Van Nuys, CA 91405". Per DMV records, this is the address listed on GASPARYAN's California's License;

c. GASPARYAN submitted an apparently altered Spectrum utility statement containing the name "Papin D Galstyan", but with the address listed of "13823 Sherman Way Apt 103, Van Nuys, CA 91405". Per DMV records, this is a slight variation of the address listed on GASPARYAN's California Driver's License;

d. GASPARYAN submitted a "selfie" with a clear, unobstructed image of his face.

22. Several hours after the July 12, 2022, search of the Rinaldi St. residence was concluded, I observed a vehicle registered to "Papin Daviti Galstyan" parked on the street

outside of the Rinaldi St. residence. On August 5, 2022, CHP Investigator Dasilva contacted the finance company (e.g. lienholder), and confirmed the vehicle was purchased on March 10, 2022 from a dealership in the city of Mission Hills, California. According to the finance company representative, only the first payment was made and the account has gone delinquent since. Due to Papin Galstyan being out of the country since October 12, 2020, the finance company signed a stolen vehicle report.

23. During GASPARYAN's arrest in April 2022 in Las Vegas, Nevada, officers recovered a California Driver's License belonging to "Papin Daviti Galstyan". Per California DMV records, this appears to be the true driver's license issued to Papin Daviti Galstyan; GASPARYAN is not depicted on this driver's license.

J. The Methamphetamine and Ghost Guns Found in GASPARYAN's Residence Indicate He Is a Drug Trafficker

24. I spoke with DEA SA Giordano, who has over 3 years of experience conducting investigations about the trafficking of methamphetamine. He explained to me that methamphetamine quantities in excess of a few grams are commonly possessed for distribution rather than personal use. He said that quantities of 100 grams or so, such as what was recovered from GASPARYAN's residence, were certainly for distribution. He explained to me that drug traffickers commonly possess firearms to defend their cash and drug stashes because otherwise they would be vulnerable

to robbery; they cannot very well complain to the police if robbed, and must of necessity possess valuable stashes of drugs and cash. He told me that increasingly drug traffickers are relying on so-called ghost guns, like those recovered from GASPARYAN's residence, because they are easy to obtain through the black market and are untraceable, which helps drug traffickers distance themselves from the firearms when they are recovered by law enforcement. Further evidence that the ghost guns belonged to GASPARYAN was found when he was arrested in Chino, California in a car with ammunition for handguns and rifles, discussed in more detail later in this affidavit. I know from my training that the rifle rounds GASPARYAN possessed both in his apartment and in his car are powerful enough to penetrate the bullet-resistant vests that police officers typically wear.

K. GASPARYAN Is a Citizen of Armenia, Which Does Not Extradite

25. I reviewed GASPARYAN's criminal history and saw that he was born in and a citizen of Armenia, and later became a naturalized citizen of the U.S., too. According to DOJ's Office of International Affairs website, "No extradition treaty is currently in force between the United States and Armenia."

L. GASPARYAN Has Engaged in Many New Offenses While on State Probation

26. According to Los Angeles County Probation Department, GASPARYAN is on probation from March 22, 2021 to March 21, 2023

in connection with state fraud/identity theft offenses. The conditions of GASPARYAN's probation also include, but are not limited to:

a. The prohibition of owning, purchasing, receiving, possessing or having any firearms, ammunitions, and magazines;

b. The requirement to submit GASPARYAN's person and property to search and seizure at any time of the day or night, by any probation officer or other peace officer, with or without a warrant, probable cause or reasonable suspicion

c. The requirement to disclose to the probation officer all electronic mail accounts, all Internet accounts, and any other means of access to any computer or computer network, all-passwords and access codes. The defendant shall consent to the search of that electronic mail and internet accounts at any time and the seizure of any information or data contained therein without a search warrant or probable cause;

d. The requirement for GASPARYAN to use only his true name, date of birth, and address.

1. GASPARYAN's April Arrest in Las Vegas with Drugs, Cash, and Checks in Other Persons' Names, During Which He Fails to Provide His Real Address

27. On April 5, 2022, GASPARYAN was arrested by Las Vegas Metropolitan Police Department for embezzlement of an automobile, possession of a stolen vehicle, and possession of a controlled substance. During this arrest, officers noted GASPARYAN also had an outstanding warrant out of Nevada Justice Court for embezzlement of an automobile from 2018. During this

arrest, GASPARYAN failed to obey officers' commands and continued to walk into the hotel/casino. Officers ultimately located GASPARYAN in one of the hotel rooms. Officers discovered the following:

- a. Stacks of \$100 bills wrapped in a \$5,000 bank currency strap, mixed with other loose bills of various denominations;
- b. Vehicle titles not in his name, bearing the name "Papin Daviti Galstyan" and "Rudy Pineda";
- c. Over \$60,000 in cashier's checks;
- d. Numerous personal bank checks not in his name, bearing the name "Papin Daviti Galstyan" and "Rudy Pineda", some of which were signed and made out to "DMV", "Rudy P", or "Angela Karchyan";
- e. A white powdery substance, which was tested and returned positive for cocaine.

28. GASPARYAN posted bail to secure his release on April 6, 2022. A future court date is scheduled for September 12, 2022. The arrest report reflects GASPARYAN's parents' address (Sherman Way in Van Nuys) as his own. As explained elsewhere in this affidavit, GASPARYAN actually resides on Rinaldi in Granada Hills under an assumed name.

2. GASPARYAN's June Arrest in San Bernardino, During Which He Provides a False Identity Instead of His True Name and Date of Birth

29. I spoke with San Bernardino County Sheriff Deputy J. Tamayo who advised me that on June 2, 2022, he encountered an

individual who identified himself as "Papin Galstyan", later determined to be GASPARYAN, at San Manuel Casino, as described below:

a. On June 2, 2022, Department of Public Safety Officers advised they conducted a welfare check on an individual asleep in his vehicle, who appeared to be under the influence. When encountered by Dep. Tamayo, GASPARYAN identified himself as "Papin Galstyan". Officers discovered the following on GASPARYAN's person and in the vehicle:

- a. *Three clear baggies containing a white powdery substance, consistent with cocaine, weighing approximately 27.5 grams total. GASPARYAN also stated he believes the drug found in the vehicle to be "crystal". According to CHP Investigator Dasilva, "crystal" is a common street name for crystal methamphetamine, which is a white crystalline drug that resembles glass fragments;*
- b. \$5,487 cash in various denominations.

b. GASPARYAN was able to avoid this arrest showing on his criminal record by providing the arresting officers with a false identity. When Dep. Tamayo was shown a picture of GASPARYAN, he confirmed that the person he encountered who presented himself as "Papin Galstyan" was indeed GASPARYAN.

c. The arrest report reflects GASPARYAN's parents' address (Sherman Way in Van Nuys) as his own. As explained elsewhere in this affidavit, GASPARYAN actually resides on Rinaldi in Granada Hills under an assumed name.

3. GASPARYAN's July Arrest in Chino with Ammunition,
During Which He Fails to Provide His Real Address

30. On July 29, 2022, GASPARYAN was arrested by Chino Police Department for possession of a stolen vehicle, and possession of ammunition by a prohibited person. During a search of the vehicle, officers discovered 145 rounds of handgun and rifle ammunition. GASPARYAN subsequently provided a Miranda-waived statement to officers and admitted to having knowledge of the ammunition found in the center console, but stated he did not know about the ammunition found elsewhere in the vehicle. GASPARYAN stated an individual named "Parkev" was possibly responsible for the ammunition, but was unable to provide any information regarding "Parkev". GASPARYAN also told officers he knew he was not allowed to have ammunition.

31. GASPARYAN was released on August 3, 2022, and a \$50,000 bond was posted on August 12, 2022. His future court date is scheduled for September 19, 2022. The arrest report reflects GASPARYAN's parents' address (Sherman Way in Van Nuys) as his own. As explained elsewhere in this affidavit, GASPARYAN actually resides on Rinaldi in Granada Hills under an assumed name.

4. GASPARYAN's August Arrest in Arizona with Drugs,
Bank Cards in Other Persons' Names, During Which
He Fails to Provide His Real Address

32. On August 10, 2022, GASPARYAN was arrested by Northern Arizona University Police Department and charged with possession

of a stolen vehicle, and felony possession of narcotics for use and for sale. Officers discovered the following:

a. 28.86 gross grams of a white powdery substance in a bag;

b. A pill bottle cap with a thick black tar residue, and a Ziplock bag with thick black tar residue, which later returned a positive test for heroin;

c. An apparently altered California Driver's License in the name of "Rudy Pineda", but with GASPARYAN's image;

d. Paperwork including checks, a high amount of blank checks, receipts, temporary tags, and insurance paperwork, some of which in other persons' names;

e. GASPARYAN was released, and a \$40,000 bond was posted on August 11, 2022. GASPARYAN's address listed on all the court forms was the Sherman Way one in Van Nuys that he used for many of his fraudulent EDD claims, which is his parents' residence. As explained elsewhere in this affidavit, GASPARYAN actually resides on Rinaldi in Granada Hills under an assumed name. His court paperwork for this arrest warned him that he must "KEEP YOUR ADDRESS UPDATED WITH THE COURT FOR ONE YEAR." This same paperwork erroneously listed his first name as "Eduardo" rather than "EDUARD." In my training and experience, criminals often alter their names slightly to make it harder to track or match them to other records, much as GASPARYAN did with slight variations in addresses he used for his fraudulent EDD applications.

M. GASPARYAN Failed to Appear

33. As noted above, during his April 5, 2022 arrest in Las Vegas, officers noted GASPARYAN had an outstanding warrant in the Nevada Justice Court in 2018 for felony embezzlement of an automobile. GASPARYAN was released on his own recognizance in connection with that investigation on April 6, 2022, and a future court date was scheduled for May 4, 2022. Gasparyan failed to appear at that hearing, and a bench warrant has been issued. A bench warrant for failure to appear was also issued for GASPARYAN based on a Nevada speeding ticket.

N. GASPARYAN Is Living Under an Assumed Identity

34. According to GASPARYAN's landlord, GASPARYAN rented his Rinaldi house under the assumed identity "Rudy Pinedd", or "Rudy Pineda", and has further used that identity to obtain EDD benefits, obtain an apparently altered U.S. Department of Homeland Security Employment Authorization Card with his image but the name of "Isaac Rudy Pineda", an apparently altered California Driver's License with his image but the name of "Isaac Rudy Pineda", and engage in further fraud related to vehicle title washing. Los Angeles County Probation Officer A. Espinoza, who has over 22 years of law enforcement experience, explained to me that criminals like GASPARYAN who are subject to search conditions as part of probation or parole will typically lie to their probation officers about where they live to avoid having their new crimes uncovered during a probation search. He explained that only the most sophisticated and cagey

probationers, however, go the next step, as GASPARYAN did, of assuming an entirely new identity so that no attempt to locate him under his true name would lead back to him and his true address.

O. I Have Not Been Able to Locate the Fraud Proceeds

35. As described above, the minimum actual loss EDD suffered from this fraud through March 2022, the last date for which I have loss data from Bank of America, is over \$800,000. I have attempted to locate these proceeds along with a Special Agent from the IRS, but we have so far been unsuccessful. It may be that GASPARYAN keeps the proceeds largely in cash, which is untraceable. It may also be that he transfers the money abroad, where it is extremely difficult for me to locate assets. FBI SA Mark Newhouse, who is on the Eurasian Organized Crime Task Force and has 18 years' experience as an agent, told me that it is common for fraudsters who are dual citizens to send the proceeds of their crimes back to their home country to prevent it from being seized by law enforcement here investigating their crimes.

P. There Will Be a Probation Hold on GASPARYAN

36. I told Probation Officer Espinoza of the Special Enforcement Operations Unit I planned to arrest GASPARYAN on this complaint. He said he would wait until GASPARYAN was in custody on this complaint before placing a probation hold on him.

CONCLUSION

37. Based upon the foregoing facts, I believe there is probable cause to believe that GASPARYAN violated Title 18, United States Code, Sections 1028A, 1344, and 1349.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 30TH day of August, 2022.



UNITED STATES MAGISTRATE JUDGE
ALKA SAGAR